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November 26, 2013

VIA E-MAIL AND FIRST CLASS MAIL

Brian A. Hill, Esq.
Miller & Chevalier
655 Fifteenth Street, NW
Suite 900
Washington, DC 20005-5701

Re: *Sokolow, et al. v. Palestinian Liberation Organization, et al.*
Docket No. 04-CV-397 (GBD)(RLE)

Dear Brian:

We are in receipt of defendants' letter to Judge Daniels dated November 22, 2013 regarding the scheduling of summary judgment and pre-trial order submissions in the above-referenced matter.

We strongly disagree with defendants' analysis in that letter. The Order of Reference to Judge Ellis never encompassed the scheduling of summary judgment or the JPTO. Therefore, we view defendants to be acting at their peril if they disregard the deadlines set by the relevant rules and practices.

However, as a compromise, plaintiffs would be prepared to jointly recommend to the Court the following dates:

- Joint Pretrial Order due January 22, 2014;
- Summary judgment motions, if any, due January 22, 2014;
- *In limine* motions and jury instructions due February 24, 2014;
- Responses to summary judgment motions due March 7, 2014, unless the Court earlier denies any motion for summary judgment; and

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- Replies to summary judgment motions and responses to *in limine* motions due March 28, 2014, unless the Court earlier denies any motion for summary judgment.

This compromise offer is available for only a limited time and will expire on the earlier of December 4, 2013 or the start of a conference with Judge Daniels.

Sincerely,

Kent A. Yalowitz / ctr

Kent A. Yalowitz